

MITCHELL D. GLINER, ESQ.
Nevada Bar #3419
3017 West Charleston Blvd., #95
Las Vegas, Nevada 89102
702-870-8700
702-870-0034 Fax
Attorney for Plaintiff

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COURT CLERK OF DISTRICT COURT

2005 OCT 20 P 3:50

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MILTON LIZAMA,

Plaintiff,

v.

EXPERIAN INFORMATION
SOLUTIONS, INC.,

Defendant.

CV-S-05-1266-RLH-PAL

JURY DEMANDED

COMPLAINT

JURISDICTION

1. The jurisdiction of this Court attains pursuant to the FCRA, 15 U.S.C. Section 1681(p), and the doctrine of supplemental jurisdiction. Venue lies in the Southern Division of the Judicial District of Nevada as Plaintiff's claims arose from acts of the Defendant perpetrated therein.

PRELIMINARY STATEMENT

2. The Plaintiff brings this action for damages based upon Defendant's violations of the Fair Credit Reporting Act, 15 U.S.C § 1681 *et seq.* (hereinafter referred to as "FCRA"), and of state law obligations brought as supplemental claims.

3. Plaintiff is a natural person and is a resident and citizen of the State of Nevada and of the United States. Plaintiff is a "consumer" as defined by § 1681a(c) of the FCRA.

4. The Defendant Experian Information Solutions, Inc. ("Experian"), is a corporate entity licensed to do business in the State of Nevada.

6. Plaintiff's creditworthiness has been repeatedly compromised by the acts, obduracy and general indifference of the Defendant.

8. During April 2003, Plaintiff's signature was forged on a vehicle sales contract subsequently assigned to Triad Financial Corporation (TFC).

10. On October 15, 2004, Plaintiff disputed TFC's reporting with Defendant (Exhibit 1).

12. Plaintiff provided Defendant copies of the contracts.

14. Plaintiff's June 20, 2005 profile reflects Defendant's continued reporting of the fraudulent TFC account (Exhibit 3).

15. In the entire course of its action, Defendant willfully and/or negligently violated the provisions of the FCRA in the following respects:

a. By willfully and/or negligently failing, in the preparation of the consumer reports concerning Plaintiff, to follow reasonable

procedures to assure maximum possible accuracy of the information
in the reports.

b. By willfully and/or negligently failing to comport with FCRA § 1681i.

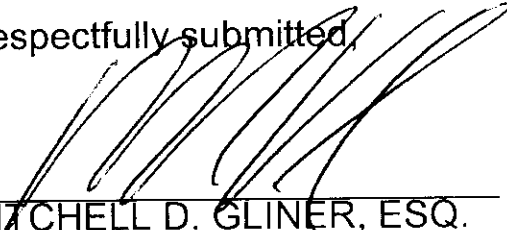
PRAYER FOR RELIEF

THEREFORE, Plaintiff prays that the Court grant the following relief as against

Defendant:

- a. actual damages;
- b. punitive damages;
- c. attorney's fees; and
- d. costs.

Respectfully submitted,


MITCHELL D. GLINER, ESQ.
Nevada Bar #3419
3017 West Charleston Boulevard
Suite 95
Las Vegas, Nevada 89102
Attorney for Plaintiff

EXHIBITS

FILE COPY

October 15, 2004

Experian Credit Reporting Agency
P.O. Box 9701
Allen, TX 75013

Dear Sir or Madame:

I am writing to dispute the following information in my file. The item I dispute is also circled on the attached copy of the report I received. I dispute the Triad Financial Corp. automobile repossession and balance due report.

This item is inaccurate because my signature was forged on the contract assigned to Triad Financial. Enclosed is a copy of the vehicle sales contract at 17% APR assigned to Triad Financial by Auto Tech dated April 17, 2003 showing me as the sole purchaser of the vehicle which is for the referenced account. That is not my signature on that contract.

Also enclosed is a copy of a vehicle sales contract at 4.850% APR also dated April 17, 2003 showing myself and Jorge Escalon-Melgar as co-purchasers, which is the contract I thought was correct. So far as I know, Triad Financial was not assigned this contract.

Please reinvestigate this matter and delete the disputed item as soon as possible.

Sincerely,



Milton Lizama

cc: Triad Financial Corp.

EXHIBIT /

experianPrepared for
MILTON J. ALBA
Report number
3040125159Report date
November 03, 2004

Page 3 of 16

Correction Summary

About our verification process

The following shows the revision(s) made to your file as a result of our verification. If you still question an item, then you may want to contact the source of the information.

The federal Fair Credit Reporting Act states that you may:

- request a description of how we verified the information, including the business name and address contacted and the telephone number if reasonably available;
- add a statement disputing the accuracy or completeness of the information; and
- request that we send these results to organizations who have reviewed your credit report in the past two years for employment purposes or six months for any other purpose (twelve months for residents of Colorado, Maryland, and New York).

If no information follows, our response appeared on the previous page.

Items we investigated		Outcome
Items	Credit items	
	TRIAD FINANCIAL CORP 4000015001011....	Remains
Personal information		Updated
Name		

Experian

Consumer Fraud Assistance
P.O. Box 1017
Allen TX 75013

If you have questions

Locate your Report Number, then contact us **within 90 days** from the date on this report.

For efficient, self-directed

service, log on to

www.experian.com/disputes.

For assistance, call

800 583 4080

M - F 9am - 5pm in your time zone.

To order a copy of your

Experian Credit Score,
call **1 888 322 5583.**

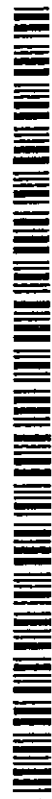
Protect and manage your

credit with Credit Manager,
www.creditexpert.com

By law, we cannot disclose certain medical information (relating to physical, mental, or behavioral health or condition). Although we do not generally collect such information, it could appear in the name of a data furnisher (i.e., "Cancer Center") that reports your payment history to us. If so, those names display in your report, but in reports to others they display only as MEDICAL PAYMENT DATA. Consumer statements included on your report at your request that contain medical information are disclosed to others.

EXHIBIT 2

0720012224



Report date

November 08 2003

Page 5 of 16

www.experian.com/disputes

Call 800-583-4080

Prepared for

MILTON HAZAKIA

Report number

3040125159

Items continued

Account number
(Last few digits)

	Date opened/ Reported since	Date of status/ Last reported	Type/ Terms/ Monthly payment	Responsibility	Credit limit or original amount/ High balance	Recent balance/ Recent payment	Status Details
QUANTUM COLLECTIONS 3224 CIVIC CENTER DR NORTH LAS VEGAS NV 89030 356149252	3-2003/ 2-2003	2-2003/ 2-2003	Installment/ 1 Months/ \$0	Individual	\$807 / NA	\$807 as of 2-2003/	Status: Collection account. \$807 past due as of 2-2003. Account history: Collection as of 2-2003

Original creditor: LAS VEGAS ATHLETIC CLUB

--4-- TRIAD FINANCIAL CORP

7711 CENTER AVE STE 250
HUNTINGTON BEACH CA
92647

4000015001011....

4-2003/ 5-2003	8-2004/ 8-2004	Installment/ 60 Months/ \$0	Individual	\$19,902 / NA	\$0 as of 8-2004/	Status: Account charged off/Repossession. \$9,657 written off. Account history: Repossession as of 6-2004 Charge Off as of 8-2004 90 days as of 5-2004 60 days as of 4-2004, 11-2003 30 days as of 3-2004, 12-2003, 10-2003
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5 ARROW FINANCIAL SERVICE

5996 W TOUHY AVE
NILES IL 60714
4262849

3-1999/ 7-2002	7-2002/ 7-2002	Installment/ NA/ \$0	Individual	\$651 / NA	NA	Status: Paid in settlement. Creditor's statement "Account legally paid in full for less than full balance."
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Original creditor: A.F.S. ASSIGNEE OF RNB -
MERY6 BANK OF AMERICA
1825 E BUCKEYE RD
PHOENIX AZ 85034
431904101394....

1-2002/ 2-2002	10-2004/ 10-2004	Revolving/ NA/ \$25	Individual	\$3,500 / \$1,430	\$943 as of 10-2004/	Status: Open/Never late.
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000000000000



experian

Before contacting us, you should carefully review this report.

Disputing information in your report

If you disagree with an item, you may dispute it. We will contact the source of the information and ask them to check their records. Because your report is updated often, contact us within 90 days from the date above.

For the fastest and easiest way to dispute information, visit:

www.experian.com/disputes

Or call 1 800 509 8495. Dispute services are available 24 hours a day, seven days a week.

***** MIXED AADC 683
 0014138 3 MB 0.718 L 500 *
 MILTON LIZAMA
 5020 KILLARNEY ST
 LAS VEGAS NV 89122-6807

Prepared for
 MILTON LIZAMA
 Report number
 0773359986

Report date
 June 20, 2005

www.experian.com/disputes Page 1 of 14

Your personal credit report

Potentially negative items or items for further review

The most common items in this section are late payments, accounts that have been charged off or sent to collection, bankruptcies, liens, and judgments. It also may contain items that are not necessarily negative, but that a potential creditor might want to review more closely, such as an account that has been settled or transferred.

Accounts in good standing

Items display in this section when your creditor reports that you have satisfactorily met the terms of your agreements with them. Some creditors may not report consumer credit information to us, so all of your accounts may not be listed.

History of your account balances

Reports up to two years of your monthly balances on an account, if reported by your creditor.

Requests for your credit history

We list anyone that has reviewed your credit information in the last two years.

Personal information

This information is reported to us by you, your creditors and other sources.

Other Experian credit management tools

Score report

Order your Experian PLUS score report by calling 1 888 322 5583.

Credit Manager

Receive unlimited access to your credit report, score and other credit management tools at www.creditexpert.com.

About Experian

Experian collects and organizes information about you and your credit history from public records, your creditors and other reliable sources. By law, we cannot disclose certain medical information (relating to physical, mental, or behavioral health or condition). Although we do not generally collect such information, it could appear in the name of a data furnisher (i.e., "Cancer Center") that reports your payment history to us. If so, those names display in your report, but in reports to others they display only as "Medical Information Provider". Consumer statements included on your report at your request that contain medical information are disclosed to others.

EXHIBIT 3



Prepared for
MILTON LIZAMA
Report number
0773359986

Report date
June 20, 2005
www.experian.com/disputes
Call 1 800 509 8495

Potentially negative items or items for further review continued

QUANTUM COLLECTIONS							
3224 CIVIC CENTER DR	Date opened Mar 2003	Date of status Feb 2003	Type Installment	Responsibility Individual	Credit limit or original amount \$741	Recent balance \$832 as of Feb 2003	Status: Collection account. \$832 past due as of Feb 2003.
NORTH LAS VEGAS NV 89030	Reported since Feb 2003	Last reported Feb 2003	Terms 1 Months		High balance NA		Account history: Collection as of Feb 2003
Partial account number 356149252			Monthly payment \$0				

Original creditor: LAS VEGAS ATHLETIC CLUB

TRIAD FINANCIAL CORP							
7711 CENTER AVE STE 250	Date opened Apr 2003	Date of status Aug 2004	Type Installment	Responsibility Individual	Credit limit or original amount \$19,902	Recent balance \$0 as of Aug 2004	Status: Account charged off/Repossession. \$9,657 written off.
HUNTINGTON BEACH CA	Reported since May 2003	Last reported Aug 2004	Terms 60 Months		High balance NA		Account history: Repossession as of Jun 2004 Charge Off as of Aug 2004 90 days as of May 2004 60 days as of Apr 2004, Nov 2003 30 days as of Mar 2004, Dec 2003, Oct 2003
Partial account number 4000015001011....			Monthly payment \$0				This item was verified on Nov 2004 and remained unchanged.

Accounts in good standing

These items may stay on your credit report for as long as they are open. Once an account is closed or paid off it may continue to appear on your report for up to ten years.

Joint items

ACTION CARD/BANK FIRST							
245 PERIMETER CENTER PKW	Date opened Dec 2000	Date of status May 2005	Type Revolving	Responsibility Individual	Credit limit or original amount \$1,600	Recent balance NA	Status: Paid, Closed/Never late.
ATLANTA GA 30346	Reported since May 2003	Last reported May 2005	Terms NA		High balance \$1,024		
Partial account number 423133301001....			Monthly payment \$0				

